

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION

UNITED STATES OF AMERICA

v.

Case No. 3:07CR00001

KEVIN ALFRED STROM

MOTION FOR CONTINUANCE

Comes now the defendant, KEVIN ALFRED STROM, and represents the truth of the following:

1. Kevin Alfred Strom was indicted by the grand jury on January 3, 2007, on charges of possession of child pornography and witness tampering, in violation of 18 U.S.C. §§ 2252A and 1512, respectively. A superseding indictment was issued on April 4, 2007. A second superseding indictment was issued on June 6, 2007. Arraignment on the second superseding indictment was held on June 11, 2007.

2. A motion to sever counts was filed by the defendant on April 24, 2007. A hearing was held on May 29, 2007 and the matter is still under advisement.

3. The case is set for a jury trial on June 20-21, 2007.

4. The Speedy Trial Act, 18 U.S.C. 3161 Section (c)(2), provides that the trial shall not commence less than thirty days from the date of defendant's initial appearance with counsel.

5. The Speedy Trial Act, 18 U.S.C. 3161 §§ 3167(h)(8)(A) and (8)(B)(iv), recognizes that it is proper to grant a continuance on the motion of counsel to serve the ends of justice

in order to afford counsel the reasonable time necessary for effective preparation.

6. The government does not object to this continuance request.

7. An alternative trial date of October 2-4, 2007 has been arranged with the clerk's office and is available to the government.

WHEREFORE, your defendant prays that the court continue the trial of this case to October 2-4, 2007.

Respectfully submitted,

KEVIN ALFRED STROM
By Counsel

Counsel:

S/Andrea L. Harris
Andrea L. Harris
Asst. Federal Public Defender
VSB 37764
401 E. Market Street, Suite 106
Charlottesville, VA 22902
Tel (434) 220-3380
Counsel for Kevin Alfred Strom

CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: counsel of record; and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: none.

S/Andrea L. Harris
Andrea L. Harris
Asst. Federal Public Defender
VSB 37764
401 E. Market Street, Suite 106
Charlottesville, VA 22902
Tel (434) 220-3380
Andrea_Harris@fd.org